Grantee Guidance

Conference Spending

Overview

The Centers for Disease Control and Prevention (CDC) must ensure that grant funds used to support conferences and meetings:

- are used efficiently and effectively
- adhere to legal requirements and Department of Health and Human Services (HHS) policy
- are able to withstand ethical questions and public scrutiny

This guidance provides CDC grantees with information about the definition of a conference and what are allowable and unallowable conference expenses.

Conference Definition

The <u>HHS Policy on Use of Appropriated Funds for Conferences and Meeting Space</u> defines a conference as a meeting, retreat, seminar, symposium, or event that involves attendee travel <u>as per OMB M-12-12</u>. Conferences typically present information on topics of interest and may include a registration, published agenda, scheduled speakers, and discussion panels. Training activities are considered conferences, as described by <u>5 CFR 410.404</u>. Grantees may be funded under a conference grant or a grant where the conference is not the primary purpose of the grant (i.e., non-conference grant).

Approval Requirements

Conference grants (i.e., where the conference is the primary purpose of the grant) will be subject to a rigorous review and approval process prior to the obligation of funds. Any specific requirements for the awardee of the conference grant will be described in the Funding Opportunity Announcement (FOA) and Notice of Award (NoA).

If applicants determine that a conference is needed to complete the activities of a grant but the conference is not specifically required in the FOA, the conference must be proposed in the grantee's application and work plan to be eligible for approval. Conferences that are funded by non-conference grants are subject to additional review and approval when the conference is sponsored or co-sponsored by CDC and the cost of the conference exceeds \$75,000. Sponsorship occurs when CDC supports a conference hosted by a nonfederal organization because it furthers CDC's mission. Sponsorship indicates that CDC is substantively involved in planning the conference, including setting the agenda, leading work groups, determining speakers, etc.

Sponsorship may involve:

- the provision of funds, generally by the Procurement and Grants Office (PGO) through a grant, cooperative agreement, interagency agreement, intra-agency agreement, contract, or purchase order
- the public expression of support without financial assistance, usually through allowing CDC's name and/or design element to be used by the sponsoring organization to promote the conference

Sponsorship excludes instances where CDC has no other costs besides travel, registration, and exhibit costs, AND has no role beyond attending, speaking, or training. Further information on sponsorship is available in the CDC policy Securing Approval for Sponsorship of Conferences.

The CDC program that oversees the FOA will be responsible for securing the necessary approvals for conferences proposed by grantees. Any changes to an approved work plan that relate to conference activities must be discussed with the assigned Grants Management Specialist/Officer and Project Officer.



Conference Expenses

Conference expenses are direct and indirect costs associated with a meeting, including (but not limited to):

- authorized travel and per diem
- hire of rooms for official business
- audiovisual use
- registration fees
- ground transportation

In general, conference expenses are allowable under CDC grants and cooperative agreements and are governed by the cost principles (2 CFR 225, 2 CFR 220, 2 CFR 230, 45 CFR 74) applicable to the recipient organization.

For conference grants, food and beverage costs for conferences or meetings are *not allowable* as described in the <u>HHS Policy on the Use of Appropriated Funds for Food</u>. For non-conference grants and cooperative agreements, food and beverages *are allowable* as described in the cost principles. However, some CDC programs may choose to implement restrictions on food and beverages.

To avoid cost disallowances, grantees should exercise prudent spending and sound judgment for conference-related expenses. Grantees should consider the following questions to determine whether costs are allowable:

- Are the costs reasonable and in accordance with the respective cost principles?
- Is there a published agenda for the meeting?
- Are proposed meals essential to the mission of the program?
- Is CDC paying for a guest speaker during a dining engagement that would create the appearance that CDC is sponsoring a social event or funding food?

Need Help?

Please contact your CDC Grants Management Specialist/Officer to help determine appropriate costs.